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12 *Attorneys for Plaintiffs Lynn Slovin,*  
13 *Samuel Katz, Jeffery Price, and*  
14 *Justin Birkhofer, on their own*  
15 *behalf, and on behalf of all others*  
16 *similarly situated*

16 **IN THE UNITED STATES DISTRICT COURT**  
17 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

18 LYNN SLOVIN, an individual, on her own  
19 behalf and on behalf of all others similarly  
20 situated,

21 Plaintiff,

22 v.

23 SUNRUN, INC., a California corporation,  
24 CLEAN ENERGY EXPERTS, LLC, a  
25 California limited liability company doing  
26 business as SOLAR AMERICA, and  
27 DOES 1-5, inclusive,

28 Defendants.

**Case No. 4:15-cv-05340-YGR**

**DECLARATION OF  
GRACE E. PARASMO**

Hon. Yvonne Gonzalez Rogers

**DECLARATION OF GRACE E. PARASMO**

I, Grace E. Parasmó, declare as follows:

1. I am a partner at Parasmó Lieberman Law, and counsel of record for Plaintiffs Lynn Slovin, Samuel Katz, Jeffery Price, and Justin Birkhofer ("Plaintiffs"). I am licensed to practice law in the states of California and New York and licensed to practice before this District. I have personal knowledge of the facts set forth herein. If called as a witness, I could and would competently testify to the matters stated herein.

2. I submit this declaration in support of Plaintiffs' motion for preliminary approval of the class action settlement and to appoint Parasmó Lieberman Law along with co-counsel, Parisi & Havens, LLP, as Class Counsel. Parasmó Lieberman Law has been actively involved in all aspects of this litigation from the filing of the initial complaint through settlement and the preparation of the instant motion. The attorneys at Parasmó Lieberman Law have significant, relevant experience in class actions and complex litigation. In particular, the Firm's attorneys have been counsel on, and are presently counsel on a significant number of class actions, which are based on alleged violations of the Telephone Consumer Protection Act (TCPA) as well as other state and federal consumer privacy laws, in this District and in courts throughout the nation. Attached hereto as Exhibit A is the Firm's current resume, which consists of a true and accurate description of these selected cases and the biographical profiles of the Firm's attorneys.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 27, 2018, in Los Angeles, California.

/s/ Grace E. Parasmó  
GRACE E. PARASMO

# EXHIBIT A

## **PARASMO LIEBERMAN LAW FIRM RESUME**

Parasmo Lieberman Law represents plaintiffs in class actions in federal and state courts throughout the nation. The Firm focuses on cases involving consumer fraud, privacy and data security, and wage and hour law. The Firm prides itself on the aggressive pursuit of our clients and the class members' interests and on the excellence of our work. The Firm takes on cases that require extensive pre-suit research and investigation that are passed up by other class action firms. The attorneys at Parasmo Lieberman Law are persistent and will endeavor to achieve the best possible outcome no matter how difficult the obstacles or well-financed the opposition. The Firm's attorneys share a common goal of the pursuit of justice by telling courts and large corporations the unheard stories of classes of aggrieved individuals.

### **Selected Cases**

***Katz v. Liberty Power Corp., LLC***, No. 18-cv-10506 (D. Mass.) (class action alleging violations of the TCPA arising from telemarketing calls promoting retail electricity using prerecorded messages and to telephone numbers registered to the National Do Not Call List and to consumers who requested that their numbers be placed on a company Do Not Call list).

***Schlossberg v. Bumble Trading, Inc.***, No. 18-cv-08376 (S.D.N.Y.) (class action alleging that Defendants' no-refund policy for its subscription-based dating services violates the New York Dating Services Law, N.Y. G.B.L. § 394-c, and New York's consumer protection statute, N.Y. G.B.L. §349).

***Vester v. Werner Enterprises Inc. and Drivers Management LLC***, No. 8:17-cv-00145 (D. Nebraska) (class action on behalf of employee truck drivers for violations of the California Labor Code and the California Bus. & Prof. Code).

***Guerra v. SCC Transport, Inc.***, No. BC645449 (Cal. Sup. Ct. Los Angeles Cty.) (PAGA representative and class action for misclassification of owner-operator truck drivers as independent contractors and violations of the California Labor Code and the California Bus. & Prof. Code).

***In re Quaker Oats Maple & Brown Sugar Instant Oatmeal Litigation***, No. 16-01442 (C.D. Cal) (food mislabeling class action alleging violations of the California UCL, CLRA, and Sherman Law).

***Vancleave v. Wal-Mart Stores, Inc.***, No. 15.-01657 (N.D. Cal) (class action alleging unfair and deceptive practices arising out of overcharging consumers for eye care good and services covered by their insurance in violation of the California UCL and CLRA).

## Attorney Biographies

### Grace E. Parasmo

Ms. Parasmo has over ten years experience in class action and complex litigation. She has served as counsel in dozens of class actions across the country resulting in hundreds of millions of dollars in relief for class members. She has unique experience working on class action trials in state and federal courts, which resulted in significant jury verdicts. She has substantial experience on a wide range of class actions and group litigation, including wage and hour, deceptive and false advertising, antitrust, privacy and data security, securities fraud and shareholder derivative litigation. As a former partner at KamberLaw, LLC, she was counsel on a number of cutting-edge Internet technology and privacy class actions against technology companies, which actions resulted in substantial class settlements and reform to consumer privacy and data collection practices of the target companies.

Ms. Parasmo graduated from New York Law School in 2006. During law school, she served as Executive Articles Editor for the New York Law School Law Review. Ms. Parasmo was a Judicial Extern for the Honorable Burton R. Lifland, former Chief Bankruptcy Judge of the Southern District of New York. She received her B.A., cum laude, with Departmental Honors, from Fordham University.

Even before practicing law, Ms. Parasmo was committed to protecting the interests of consumers. During college, she worked in the Bureau of Internet and Technology of the New York State Attorney Generals' Office, cataloging consumer complaints and identifying patterns of Internet fraud and illegality for potential enforcement actions. During law school, she continued working in the Attorney General's Office in the Bureau of Consumer Fraud and Protection as a Complaint Mediator and Legal Intern on a number of enforcement actions, including actions arising out of high-pressure sales tactics of health clubs.

Ms. Parasmo is admitted to practice law in the States of New York and California, the United States District Courts for the Northern and Central Districts of California and the Southern and Eastern Districts of New York. She is a member of the Federal Bar Council and the International Association of Privacy Professionals and is a Certified Information Privacy Professional. Ms. Parasmo gives lectures about online privacy and technology law.

Ms. Parasmo served as counsel in the following selected class actions:

### Consumer Protection, Privacy, Security, and Information Technology

***Guido v. L'Oréal U.S.A., Inc., No. 11-CV-01067*** (C.D. Cal.)(class action that resulted in class settlement that required L'Oréal USA to comply with the Federal Hazardous Substances Act and its corresponding regulations for classifying products as flammable pursuant to 16 C.F.R. 1500.3 for all Garnier Fructis Hair-Styling products in the Sleek & Shine product line).

***Fernandez v. Curacao Ltd., et al, No CV13-03439*** (C.D. Cal.)(class action alleging violations of the TCPA arising from text messages and prerecorded telephone calls to cellular phones of class members through an automatic telephone dialing system without prior express consent).

***In Re: iPhone/iPad Application Consumer Privacy Litigation***, MDL No. 2250 (N.D. Cal.) (class action involving the interaction of Apple mobile devices and mobile apps to transmit consumers' personal information and geolocation data to third-party advertisers and analytics networks without consent)

***In Re Hulu Privacy Litigation***, No. 3:11-CV-03764-LB (N.D. Cal.) (class action alleging violations of the federal Video Privacy Protection Act arising from company's unauthorized disclosure of consumers' video viewing information to third-party advertisers, metrics companies, and social networks)

***In Re Clearspring Flash Cookie Litig.***, No. 10-cv-05948-GW; ***In Re Quantcast Advertising Cookie Litig.***, 10-cv-05484-GW-JCG (C.D. Cal.) (class action that resulted in landmark settlements including cy pres funds and injunctive relief that enjoined third-party ad and analytics companies' repurposing of consumers' Adobe Flash software to override browser privacy and security settings to track consumers).

***Kim v. Space Pencil d/b/a Kissmetrics***, No. 3:11-cv-03796-LB (N.D. Cal. 2011) (class action arising out of third-party analytics company's repurposing of consumers' computer resources to override their browser privacy and security settings to track consumers; settlement resulted in injunctive relief for class that stopped the complained-of tracking activities).

***Valentine v. NebuAd***, No. C 08-05113 TEH (N.D. Cal. 2011) (class action alleging violation of the Electronic Communications Privacy Act (Wiretap Act) arising out of online ad-serving company's use of deep packet inspection for behavioral targeting of online ads; obtained a cy pres fund for ECPA violations.)

### ***Wage and Hour Litigation***

***Braun and Hummel v. Wal-Mart Stores, Inc.***, Case Nos. 3127 and 3757 (Court of Common Pleas, Philadelphia County) (Plaintiffs obtained a \$78 million jury verdict against Wal-Mart and an express finding that Wal-Mart acted in bad faith in failing to pay class members for missed rest breaks and off the clock work. The verdict was hailed as the largest jury verdict in the Commonwealth of Pennsylvania in 2006. On October 3, 2007, the Court of Common Pleas ordered Wal-Mart to pay an additional \$62.3 million in statutory damages to class members. On November 14, 2007, a judgment for in excess of \$187 million was entered by the trial judge against Wal-Mart. On June 1, 2011, the Superior Court of Pennsylvania affirmed the \$150 million judgment against Wal-Mart, and the three judge panel held that there was sufficient evidence in the record to conclude that Wal-Mart breached its contract with its hourly employees and violated the state's labor laws. Thereafter, Wal-Mart sought leave to appeal to the Pennsylvania Supreme Court. The Pennsylvania Supreme Court affirmed the decisions of two lower courts and the unanimous class action jury verdict).

***Iliadis, et al. v. Wal-Mart Stores, Inc.*** Case No. MID-L-5498-02 (N.J. Sup. Ct., Middlesex Co.) (after class certification and further proceedings, a settlement was reached providing for injunctive relief and the payment by Wal-Mart of up to \$28 million to hourly employees for unpaid rest and meal breaks and off-the-clock work).

## **Yitzchak H. Lieberman**

Mr. Lieberman has served as counsel in numerous class actions, including class actions involving violations of the federal privacy statutes, such as the Telephone Consumer Protection Act and the federal Video Privacy Protection Act. As a former partner of KamberLaw, LLP, he was counsel on a number of consumer class actions in addition to heading the firm's insurance law practice.

Mr. Lieberman graduated from Boston University School of Law in 2006. During law school, Mr. Lieberman was a Judicial Intern for the Hon. David I. Schmidt, New York State Supreme Court, Kings County. Mr. Lieberman studied at Talmudical academies and received his Bachelor of Talmudic Law (BTL) from Mikdash Melech. A BTL is a law degree comprising the study, analysis and critical thinking methodology of Talmud, and focuses on textual analysis, principles of logic, and game theory. Mr. Lieberman also studied ancient Hebrew and Aramaic texts.

Mr. Lieberman is admitted to practice law in the States of New York and California and in the United States District Courts for the Northern and Central Districts of California.

Mr. Lieberman served as counsel in the following selected class actions:

***In re Collecto, Inc. Telephone Consumer Protection Act (TCPA) Litigation, Master***, No. 1:14-md-2513-RGS (D. Mass)(TCPA class action alleging that third party debt collector placed calls to collect debts to cellular telephone numbers without an agreement with the creditor for whom it sought to collect the debt).

***Lofton v. Verizon***, No. 13-cv-05665 (N.D. Cal.) (class action alleging violations of the TCPA against third party debt collectors who employed predictive dialers and recorded calls without consent).

***Wang v. Bank of America***, No. CGC 12-526452 (Sup. Ct. San Fran. Cty.) (class action which resulted in 12,225 persons throughout California receiving compensation as a result of a dispute over the proper interpretation of a bank deposit agreement).

***Holmes v. NCO, Inc., Case No.***, 3:10-cv-2543 (S.D. Cal.) (Fair Debt Collection Practices Act class action which resulted in over 1,000 persons whose credit reports were impacted to receive nearly the entire amount of possible damages recoverable, even after trial).

***Guido v. L'Oréal U.S.A., Inc.***, No. 11-CV-01067 (C.D. Cal.) (class action that resulted in class settlement that required L'Oréal USA to comply with the Federal Hazardous Substances Act and its corresponding regulations for classifying products as flammable pursuant to 16 C.F.R. 1500.3 for all Garnier Fructis Hair-Styling products in the Sleek & Shine product line).

***In Re Hulu Privacy Litigation***, No. 3:11-CV-03764-LB (N.D. Cal.)(class action alleging violations of the federal Video Privacy Protection Act arising from company's unauthorized disclosure of consumers' video viewing information to third-party advertisers, metrics companies, and social networks)